

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA

v.

SAMUEL GULICK,

Defendant.

Criminal Action No. 21-01-JNA

FILED

JAN - 4 2021

INFORMATION

The United States Attorney for the District of Delaware charges that: U.S. DISTRICT COURT DISTRICT OF DELAWARE

COUNT ONE

On or about January 3, 2020, in the District of Delaware, and elsewhere, the defendant, SAMUEL GULICK, intentionally damaged and destroyed the property of a facility, namely, the Planned Parenthood clinic located on Delaware Avenue in Newark, Delaware and attempted to do so, because such facility provided reproductive health services, all in violation of Title 18, United States Code, Section 248(a)(3).

COUNT TWO

On or about January 3, 2020, in the District of Delaware, and elsewhere, the defendant, SAMUEL GULICK, did knowingly make a firearm, that is: a destructive device as defined by 26 U.S.C. § 5845(a)(8) and (f)(1)(A), which was not registered to the defendant in the National Firearms Registration and Transfer Record, as required by 26 U.S.C. § 5841, all in violation of 26 U.S.C. 5861(d).

NOTICE OF FORFEITURE

The allegations contained in Count One of this Information are hereby re-alleged and incorporated by reference into this Notice for purpose of alleging forfeiture pursuant to Title 18,

United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

1. Upon conviction of Count One of this Information, SAMUEL GULICK, shall forfeit to the United States, (1) any property, real or personal, which constitutes or is derived from proceeds traceable to these offenses, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c); (2) any property constituting, or derived from, proceeds the defendant obtained directly or indirectly as a result of these offenses, pursuant to Title 18, United States Code, Section 982(a)(2)(B); and (3) any explosive materials involved or used or intended to be used in committing these offense, pursuant to Title 18, United States Code, Section 844(c) and Title 28, United States Code, Section 2461(c). The United States will also seek a forfeiture money judgment against the defendant equal to the value of: (1) any property, real or personal, which constitutes or is derived from proceeds traceable to these offenses and (2) any property constituting, or derived from, proceeds the defendant obtained directly or indirectly as a result of these offenses.

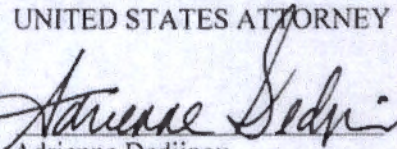
2. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

the defendant shall forfeit to the United States any other property of the defendant, up to the value of the property described above, pursuant to Title 21 United States Code, Section 853(p).

DAVID C. WEISS
UNITED STATES ATTORNEY

By:


Adrienne Dedjinou
Assistant United States Attorney

Dated: 12/11/, 2020